

### REMARKS/ARGUMENTS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-3, 12, 17, 18, 20, 24-27, 36, 41-43 are pending in the present application. No claims are amended by the present amendment, thus, no new matter is added.

In the outstanding Office Action, Claims 1-3, 12, 17, 18, 20, 24-27, 36, 41-43 were rejected under 35 U.S.C. §102(e)<sup>1</sup> as unpatentable over Suzuki (U.S. Pat. Pub. No. 2003/0156184).

Addressing now the rejection of Claims 1-3, 12, 17, 18, 20, 24-27, 36, 41-43 under 35 U.S.C. §102(e) as anticipated by Suzuki, that rejection is respectfully traversed.

Claim 17 recites, in part,

An image forming apparatus that forms an electrostatic latent image on a medium to be scanned by laser beams, which are projected from a plurality of laser light sources and periodically deflected by a rotational deflecting unit, so that the laser beams scan the medium, which is uniformly charged and moving in a sub-scanning direction, in a main-scanning direction perpendicular to the sub-scanning direction, the image forming apparatus comprising:

a pixel clock generating unit that generates pixel clocks, which are used for controlling timings of projection of said laser beams, separately for each of said laser light sources, and for performing a phase change of each of said pixel clocks; and

a phase control unit that controls independently each of said pixel clocks.

Claims 17, 24 and 41 recite similar features regarding independent control of the implementation of phase change in each of the pixel clocks.

Suzuki describes an optical scan device that includes a pixel clock. In addition, Suzuki describes a phase adjustment method for adjusting the pixel clocks.

---

<sup>1</sup> The outstanding Action rejects the claims under §102(b) however, Applicants believe the outstanding Action intended to cite §102(e).

However, Suzuki does not describe or suggest a phase control unit that controls independently each of said pixel clocks, as is recited in Claim 1.

The outstanding Action states on page 3 that Figure 6, and specifically comparator 3 of Suzuki, describes a phase control unit that independent controls each of the pixel clocks. Applicants respectfully traverse this assertion.

Specifically, Applicants note that the comparator 3 of Suzuki merely outputs a value (control signal 1) to the first clock generation circuit 4 based on a comparison value that is output by the comparison value generation circuit 9. As is noted in paragraphs 136-144 of Suzuki, the comparison value generation circuit 9 receives phase data and outputs comparison value 1 and comparison value 2, which are related, to comparators 1 and 2 which output respective control signals.

In other words, the implementation of phase change to the clocks 1 and 2 is controlled by a comparison value generation circuit 9 in an associated fashion and not independently. Specifically, as is noted in Table 2 of Suzuki, comparison value 1 is pegged to comparison value 2. One set of phase data is used to determine the comparison values which are used to modify both clock 1 and clock 2.

In contrast, in the claimed invention, the phase control unit independently controls each of said pixel clocks. Thus, in a non-limiting example, first phase change data can be used to adjust a first pixel clock while second phase change data can be used to adjust a second pixel clock in a different way, independent of any modification to the first pixel clock. This feature is simply not described or suggested in Suzuki.

Therefore, as Suzuki does not describe or suggest controlling independently each of the pixel clocks, Applicants respectfully submit that Claim 1, and similarly Claims 17, 24 and 41 and claims depending therefrom, patentably distinguish over Suzuki.

Consequently, for the reasons discussed in detail above, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal allowance. Therefore, a Notice of Allowance is earnestly solicited.

Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact the undersigned representative at the below listed telephone number.

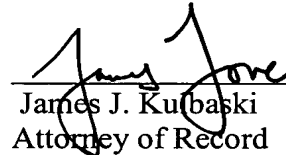
Customer Number

**22850**

Tel: (703) 413-3000  
Fax: (703) 413 -2220  
(OSMMN 08/07)

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.



---

James J. Kurbaski  
Attorney of Record  
Registration No. 34,648

James Love  
Registration No. 58,421